LAW OFFICES OF

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February 25, 2021

Honorable Paul A. Engelmayer United States District Judge Southern District of New York 500 Pearl Street New York, New York 10002

Re: <u>United States v. Jose Robles</u>

08 Cr. 1114 (PAE)

Dear Judge Engelmayer:

On February 11, 2021, the Court asked me to submit a memorandum by February 25, 2021, in support of a *pro se* motion by defendant Jose Robles for compassionate release. (ECF Doc. No. 84). For the reasons set forth below, I respectfully seek a thirty day extension of time to submit this memorandum.

First, I have not yet spoken with my client. Although I promptly wrote to Mr. Robles upon receipt of the Court's Order, enclosing a copy of the Court's Order and the Mandate of the Second Circuit issued on February 12, 2021, denying Mr. Robles leave to file a successive §2255 motion, I have not heard back from Mr. Robles, either by email or letter. I have contacted the facility where Mr. Robles is housed to make phone contact with him. I require time to share with my client my thoughts and my draft memorandum in support of his motion before submitting it.

Second, there are issues regarding this motion that I need to discuss with the Government. I have communicated with the assigned Assistant United States Attorney by email and he welcomes the opportunity to discuss this case further.

The Government consents to this application, provided that I consent in advance to an adjournment if required by the Government. I so consent.

Respectfully submitted,

Scott B. Tulman

SBT:ss

Granted.

SO ORDERED.

PAUL A. ENGELMAYER
United States District Judge

February 25, 2021